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13 **UNITED STATES DISTRICT COURT**

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15 **NORTHERN DISTRICT OF CALIFORNIA**

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17 **SAN FRANCISCO DIVISION**

18 IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

19 This Document Relates to:

20 ALL ACTIONS

21 Case No. 3:23-md-03084-CRB

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23 **DEFENDANT UBER TECHNOLOGIES,
INC., RAISER, LLC, AND RAISER-CA,
LLC'S BRIEF IN SUPPORT OF UBER'S
PRIVILEGE CLAIMS CHALLENGED BY
PLAINTIFFS FOR THE TRAVIS
KALANICK CUSTODIAL FILE –
PURSUANT TO SPECIAL MASTER
ORDER NO. 3 (DKT. 2472)**

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1 Pursuant to Special Master Order No. 3, I (4) (Dkt. 2472), Defendants submit this brief in
 2 support of their position on the remaining privilege challenges for custodian Travis Kalanick. On
 3 March 25, 2025, Plaintiffs challenged approximately 11 documents within this custodial file. On
 4 April 25, 2025, Plaintiffs challenged an additional 37 documents within this custodial file from
 5 privilege logs served after March 24, 2025, bringing the total number of challenged documents to
 6 48. Through conferrals, the parties have narrowed their dispute to 14 challenges. These challenges
 7 are now submitted for the Special Master's review.

8 Defendants incorporate by reference the legal standard and arguments set forth in their prior
 9 briefing (Dkts. 2433, 2461, 2528, 2544, and 2580). As explained more fully in the prior briefs, the
 10 applicable legal standard and the factual material previously provided to the Special Master,¹ when
 11 reviewed in conjunction with the challenged documents and the associated metadata fields, support
 12 Uber's privilege and work product assertions. The remaining privilege claims submitted for the
 13 Special Master's determination should be upheld.

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16 DATED: May 2, 2025

Respectfully submitted,

17 **SHOOK HARDY & BACON L.L.P.**

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By: /s/ Jennifer Hill
 JENNIFER HILL

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¹ As requested by the Special Master, Uber has provided (1) a glossary of terms commonly used in disputed documents, (2) a list of names and titles of relevant Uber inside and outside counsel, and (3) a digest of third-parties present in its privilege log. Defense counsel will also be available for any questions the Special Master may have during the review process.

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CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

/s/ Jennifer Hill
JENNIFER HILL